

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and FACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

District Judge Douglas P.
Woodlock

Magistrate Judge Robert B.
Collings

MARK ZUCKERBERG and
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**PLAINTIFF'S MOTION TO COMPEL FACEBOOK
DEFENDANTS' ANSWERS TO INTERROGATORY NOS. 19-23**

For the reasons fully set forth in the accompanying memorandum, Plaintiff hereby moves for an order compelling Facebook Defendants to provide complete answers to Interrogatory Nos. 19-23.

CERTIFICATION UNDER L.R. 7.1(A)(2) and 37.1(B)

Plaintiff's counsel hereby certifies under L.R. 7.1(A)(2) and 37.1(B) that counsel for the parties conferred in good faith by telephone discovery conference on November 16, 2005, but were unable to resolve the issues covered by this motion. Defendants Thefacebook, Inc., Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes ("Facebook Defendants") were represented during the conference by Monte Cooper and Robert Nagel of the Orrick, Herrington law firm. Plaintiff was represented by Troy Grabow and Margaret Esquenet of the Finnegan law firm. Counsel for Defendant Eduardo Saverin chose not to participate in the meet and confer.

The parties were not able to reach agreement on the issues addressed in the meet and confer.

REQUEST FOR ORAL ARGUMENT

Plaintiff believes oral argument may assist the Court, and wishes to be heard on these issues.

PROPOSED ORDER

A proposed Order is submitted with this motion as Exhibit A.

DATED: January 5, 2006

/s/ Troy E. Grabow
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Attorneys for Plaintiff and Counterclaim
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 5, 2006.